

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WILLIAM DEYESO,)
Plaintiff,)
)
v.)
) C.A. No. 08-11538-LTS
KAIZEN MANAGEMENT, LLC,)
KAIZEN MEDIA HOLDINGS LLC,)
KAIZEN VIRTUAL TRAINING, LLC,)
D. KIM HACKETT, AND KEVIN CONNOR)
Defendants.)

REQUEST FOR ENTRY OF DEFAULT AGAINST KAIZEN MANAGEMENT, LLC,
KAIZEN MEDIA HOLDINGS LLC, AND KAIZEN VIRTUAL TRAINING, LLC
PURSUANT TO FED. R. CIV. P. 55(a)

Plaintiff William Deyesso (“Deyesso”) requests, pursuant to Fed. R. Civ. P. 55(a), that the Clerk of the United States District Court for the District of Massachusetts enter defaults against Defendants Kaizen Management, LLC, Kaizen Media Holdings LLC, and Kaizen Virtual Training, LLC (collectively, the “Kaizen Defendants”). As grounds for this request, Deyesso states that each of the Kaizen Defendants have failed to answer or otherwise defend this action, all as set forth in the Affidavit of Counsel filed concurrently with this Request.

WHEREFORE, Deyesso respectfully requests the entry of defaults against Defendants Kaizen Management, LLC, Kaizen Media Holdings LLC, and Kaizen Virtual Training, LLC.

Respectfully submitted,
WILLIAM DEYESO,
By his attorneys,

/s/ Joshua E. Friedman, Esq.

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Dated: March 27, 2009
471385 v1/37881/25

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 20, 2008

/s/ Joshua E. Friedman